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F.# 2023R00264

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 922(g)(1))

ANTHONY COSTA,

25-MJ-74

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JEFF P. BORRIELLO, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, and a law enforcement officer duly appointed according to the law and acting as such.

On or about March 6, 2025, within the Eastern District of New York and elsewhere, the defendant ANTHONY COSTA, knowing that he had been previously convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting interstate or foreign commerce a firearm, to wit: a Jennings model J-22 .22 caliber pistol with serial number 148454.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been involved in the investigation of numerous cases involving the recovery of firearms and ammunition. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant’s criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about March 6, 2025, FBI agents and task force officers executed a Court-authorized search warrant of a gray Ford Explorer with New York license plate LRW2777 and vehicle identification number 1FMUK8DH3SGA48236 (the “Vehicle”).² See 25-MC-906 (E.D.N.Y.). Law enforcement officers stopped the Vehicle, which was being driven by COSTA, the sole occupant of the Vehicle, in a parking lot located at or around 236 Richmond Valley Road in Staten Island.

3. As part of the search of the Vehicle, law enforcement officers recovered a Jennings model J-22 .22 caliber pistol with serial number 148454, which was loaded with six rounds of ammunition (the “Firearm”). The Firearm was contained in a Ziploc bag, which was recovered inside a plastic grocery bag in the footwell behind the driver’s seat of the Vehicle.

4. I have reviewed COSTA’s criminal history. Among other convictions, on or about June 1, 2005, COSTA pled guilty to witness retaliation in violation of Title 18, United States Code, Section 1513, for which he was sentenced to 57 months’ imprisonment.

² According to New York Department of Motor Vehicle records, since December 2024, the Vehicle has been registered to COSTA’s son, Vincent Angelo Costa. Since November 6, 2024, COSTA has been observed on video surveillance footage and by law enforcement agents driving the Vehicle on over sixteen occasions.

5. I have conferred with a Nexus expert, a Special Agent of the Bureau of Alcohol, Tobacco, Firearms and Explosives, who has informed me, in sum and substance and in part, that the Jennings model J-22 .22 caliber pistol with serial number 148454 recovered in this case was manufactured outside the state of New York.

WHEREFORE, your deponent respectfully requests that the defendant ANTHONY COSTA be dealt with according to law.



JEFF P. BORRIELLO
Special Agent
Federal Bureau of Investigation

Sworn to before me this
6th day of March, 2025

